KOHRMAN | JACKSON | KRANTZ

Jennifer M. Hart | Associate
Direct: 216.736.7208 | Cell: 614.316.4031 | jmh@kjk.com
One Cleveland Center | 1375 East Ninth Street
29th Floor | Cleveland, Ohio 44114-1793
Main: 216.696.8700 | Toll-free: 888.696.8700 | Fax: 216.621.6536

VIA EMAIL AND REGULAR MAIL

May 25, 2017

1:17 MC 00036

Copyright Agent
Amazon.com Legal Department
P.O. Box 81226
Seattle, WA 98108
e-mail: copyright@amazon.com

Dear Sir or Madam,

Please be advised that the undersigned and the law firm of Kohrman Jackson & Krantz LLP represent The NOCO® Company ("NOCO"). As you have been informed previously via emails to copyright@amazon.com, a number of individuals and/or corporations (collectively, the "Unauthorized Resellers") are using amazon.com to violate NOCO's copyright and other intellectual property rights in a number of images, text and illustrations via unauthorized access to Amazon Standard Identification Numbers ("ASINs").

NOCO provided copyrighted material to Amazon in connection with the ASIN for each of its products, including product descriptions, images, and other documentation regarding the products. Indeed, all of the (i) product descriptions; (ii) text; and (iii) images associated with the ASINs for NOCO products are NOCO's copyrighted material. Copies of the original files that were provided to Amazon for each ASIN are attached.[1]

The use of these ASINs by the Unauthorized Resellers is a violation of NOCO's rights in its copyrighted materials. A listing of Unauthorized Resellers for each ASIN is attached for your reference as Schedule A.

This letter is official notification under Section 512(c) of the Digital Millennium Copyright Act ("DMCA"), and I seek the removal of the listings by the Unauthorized Resellers for each of the ASINs on Schedule A. I further request that you immediately notify the Unauthorized Resellers of this notice and inform them of their duty to remove the listings immediately, and notify them to cease any further unauthorized posting of sales on amazon.com in the future.

Please also be advised that law requires you, as a service provider, to disable access to the infringing materials upon receiving this notice. Under US law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify ongoing copyright infringement. If service providers do not investigate and remove or disable the infringing material this immunity is lost. Therefore, in order for you to remain immune from a copyright

FILED
2017 MAY 26 AM 10:52
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

[1] The material for certain ASINs may have been updated since the original submission, however, all of the content for each of the ASINs remains NOCO's copyrighted property.

KOHRMAN | JACKSON | KRANTZ

1375 East Ninth Street | One Cleveland Center, 29th Floor | Cleveland, Ohio 44114

Main: 216.696.8700 | Toll-free: 888.696.8700 | 216.621.6536

infringement action you will need to investigate and ultimately remove or otherwise disable access to these ASINs by the Unauthorized Resellers and remove their postings with all due speed should the direct infringer not comply immediately.

In addition, please preserve all documents, including electronically stored information, relating to the sellers listed below, including, without limitation, all personally-identifying information pertaining to these sellers and all transaction records associated with these accounts.

I am providing this notice in good faith and with the reasonable belief that rights NOCO owns are being infringed. Under penalty of perjury I certify that the information contained in the notification is both true and accurate, and I have the authority to act on behalf of the owner of the copyright(s) involved.

Sincerely,

Jennifer M. Hart

Enclosure